

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KATHERINE L. JOHNSON;)
MYRTICE WIGFALL;)
LAWANDA MORRIS;)
LINDA WASHINGTON, *through her*)
Administrator and next of kin,)
TERRY COLLINS;)
JOHN HARMON;)
JOHN JOWELL;)
BRANDIE MOORE;)
PATRICIA MOORE;)
RODERICK MOORE;)
ERIC HOOD;)
ISALAH CRAIG;)
DIANE BURCH;)
STEVEN BELL;)
TERRY COLLINS, *individually;*)
THELMA PARNELL;)
MITCHELL GREEN;)
JOHNNY MOORE;)
CONSIDER IT SOLD, LLC;)

Plaintiffs,)

vs.)

WOODSIDE CONDOMINIUM a/k/a)
WOODSIDE CONDOMINIUM)
ASSOCIATION;)
BILL PEOPLES;)
KENNETH E. HAEUSER;)
ALCION PAUL;)
ETHEL SIZEMORE;)
EARL GRANT;)
STEPHEN MCDANIEL;)

Defendants.)

CIVIL ACTION No. _____

NOTICE OF REMOVAL

COME now the Defendants in the above-styled cause, and pursuant to 28 U.S.C. §§ 1441 and 1446, gives notice of its removal of this action to the United States District Court for the Northern District of Alabama, Southern Division. As grounds therefor, the Defendant states as follows:

1. WOODSIDE CONDOMINIUM a/k/a WOODSIDE CONDOMINIUM ASSOCIATION; BILL PEOPLES; KENNETH E. HAEUSER; ALCION PAUL; ETHEL SIZEMORE; EARL GRANT; and STEPHEN MCDANIEL are the defendants in the civil action brought on October 14, 2016, in the Circuit Court of Jefferson County, Alabama. Pursuant to provisions of Section 1441 and 1446 of Title 28 of the United States Code, WOODSIDE CONDOMINIUM a/k/a WOODSIDE CONDOMINIUM ASSOCIATION; BILL PEOPLES; KENNETH E. HAEUSER; ALCION PAUL; ETHEL SIZEMORE; EARL GRANT; and STEPHEN MCDANIEL removes this action to the United States District Court for the Northern District of Alabama, Southern Division, which is the judicial district and division in which the action is pending.

2. The grounds for removal of this action are: plaintiff's amended complaint alleging violations of the Fair Housing Act, 42 U.S.C. §§ 3601 to 3619, creating federal question jurisdiction. Removal of this action is, therefore, proper under Section 1441 of Title 28 of the United States Code because this is a civil action brought in state court over which the federal district courts would have had original jurisdiction had the action been commenced in federal court. The other bases for relief asserted by the plaintiffs in their action all arise out of the same set of facts and are part of the same case and controversy, so that this court has supplemental jurisdiction of them within the meaning of 28 U.S.C. § 1367(a). Therefore, this is an action over which this court would have had original jurisdiction had it been filed initially in this court, and removal to this court is proper under the provision of 28 U.S.C. § 1441(a).

3. This Notice of Removal is timely under Section 1446(b)(3) of Title 28 of the United States Code because the removability of this action was not apparent until December 4, 2019, the date on which the plaintiff in that action filed Plaintiffs' Thirteenth Amended Complaint adding a claim by Eric Hood for violations of the Fair Housing Act, 42 U.S.C. §§ 3601 to 3619, which was first served on the Defendants by electronic service on December 4, 2019. This notice of removal is

timely filed under 28 U.S.C. § 1446(b)(3) in that it is filed within 30 days of receipt of the Plaintiffs' Thirteenth Amended Complaint.

4. Attached are copies of all state-court papers served on the defendants at the time of removal:

1. Document 2-Exhibit 1 Complaint
2. Document 3-Exhibit 2 Plaintiffs' First Consolidated Discovery
3. Document 9-Exhibit 3 Alias Complaint with Consolidated Discovery to Registered Agent
4. Document 13-Exhibit 4 Alias Complaint w Consolidated Discovery to Serve Bill Peoples
5. Document 20-Exhibit 5 Woodside Answer to Complaint
6. Document 22-Exhibit 6 Amendment to Complaint Naming Lawanda Morris as Party Plaintiff
7. Document 25-Exhibit 7 Notice of Appearance of Jeffrey H Dial
8. Document 27-Exhibit 8 Order-Standard Track Assignment and Status Conference Hearing
9. Document 30-Exhibit 9 Plaintiffs' Motion to Consolidate
10. Document 33-Exhibit 10 Plaintiffs' Response in Opposition to Defendant, Myrtice Wigfall's Motion to Consolidate
11. Document 36-Exhibit 11 Plaintiffs' Corrected Response in Opposition to Defendant, Myrtice Wigfall's Motion to Consolidate
12. Document 38-Exhibit 12 Order-Motion to Consolidate is Denied
13. Document 40-Exhibit 13 Woodside Answers to Interrogatories
14. Document 42-Exhibit 14 NOS-Defendant's Response to Interrogatories
15. Document 44-Exhibit 15 Woodside Answer to Amended Complaint
16. Document 47-Exhibit 16 Defendant's Motion for the Payment of Current Condo Assessment Dues
17. Document 50-Exhibit 17 Defendant's Amended Motion for the Payment of Current Condo Assessment Dues
18. Document 52-Exhibit 18 Order-Plaintiffs' Response to Defendant's Motion for the Payment of Current Condo Assessment Dues by 3/1/17
19. Document 55-Exhibit 19 Plaintiffs' Motion to Consolidate
20. Document 58-Exhibit 20 Plaintiffs' Response in Opposition to Defendant, Myrtice Wigfall's Second Motion to Consolidate

21. Document 61-Exhibit 21 Plaintiffs' Amended Response in Opposition to Defendant, Myrtice Wigfall's Second Motion to Consolidate
22. Document 63-Exhibit 22 Order-Plaintiffs' Motion to Consolidate Granted
23. Document 65-Exhibit 23 Order-granting the Plaintiffs' Motion to Consolidate is Vacated
24. Document 68-Exhibit 24 Woodside's Motion to Reconsider
25. Document 70-Exhibit 25 Plaintiffs' Response to Defendant's Motion for the Payment of Current Condo Assessment Dues
26. Document 73-Exhibit 26 Defendant's Response to Plaintiffs' Objection for the Payment of Current Condo Assessment Dues
27. Document 76-Exhibit 27 Motion to Strike Defendant's Response to Plaintiffs' Objection for the Payment of Current Condo Assessment Dues
28. Document 78-Exhibit 28 NOS-Defendant's Discovery to Plaintiffs Katherine L. Johnson, Myrtice Wigfall, and Lawanda Morris
29. Document 80-Exhibit 29 Order-Plaintiff's Second Motion to Consolidate is Denied
30. Document 83-Exhibit 30 Motion to Compel
31. Document 84-Exhibit 31 Motion to Compel Exhibit A
32. Document 85-Exhibit 32 Motion to Compel Exhibit B
33. Document 86-Exhibit 33 Motion to Compel Exhibit C
34. Document 88-Exhibit 34 Notice of Appearance of Robert E. Parsons
35. Document 90-Exhibit 35 Amendment to Complaint Naming Loretta Rice and Linda Washington as Party Plaintiffs
36. Document 92-Exhibit 36 Notice of Depo of Bill Peoples
37. Document 94-Exhibit 37 Notice of Depo of Earl Grant
38. Document 96-Exhibit 38 Notice of Depo of Ethel Sizemore
39. Document 98-Exhibit 39 Notice of Depo of Ken Houser
40. Document 100-Exhibit 40 Notice of Depo of Steve McDaniel
41. Document 102-Exhibit 41 Notice of Depo of Alcion Paul
42. Document 104-Exhibit 42 Scheduling Order and Trial Setting for 6/18/2018
43. Document 106-Exhibit 43 Mediation Order for Deadline of 6/18/2018
44. Document 108-Exhibit 44 Amendment to Complaint Naming John Harmon as a Party Plaintiff

- 45. Document 110-Exhibit 45 Order-Defendant to Respond to Plaintiffs' Motion for Extension of Time by 4/14/2017
- 46. Document 112-Exhibit 46 Woodside's Answer to Second Amended Complaint Naming Loretta Rice and Linda Washington as Party Plaintiffs
- 47. Document 115-Exhibit 47 Motion for Extension of Time to Respond to Plaintiffs' Motion to Compel
- 48. Document 117-Exhibit 48 Order-Motion for Extension of Time is Granted
- 49. Document 119-Exhibit 49 Woodside's Answer to Third Amended Complaint Naming John Harmon as a Party Plaintiff
- 50. Document 122-Exhibit 50 Motion to Withdraw-Russelle L Hubbard
- 51. Document 125-Exhibit 51 Amended Motion to Withdraw-Russelle L Hubbard
- 52. Document 128-Exhibit 52 Motion to Withdraw-G. Alan Smith
- 53. Document 130-Exhibit 53 Order-Motions to Withdraw Granted
- 54. Document 132-Exhibit 54 Defendant Woodside's Supplemental Responses to Plaintiffs' First Consolidated Discovery
- 55. Document 134-Exhibit 55 Order-Plaintiffs' Motion to Compel is Moot
- 56. Document 136-Exhibit 56 NOS Plaintiffs' Notice of Depo of Ken Hauser, Alcion Paul, Ethel Sizemore, Steve McDaniel, Bill Peoples and Earl Grant
- 57. Document 138-Exhibit 57 Plaintiffs' Amended Complaint adding Defendants Bill Peoples, Ken Hauser, Alcion Paul, Ethel Sizemore, Earl Grant, and Steve McDaniel
- 58. Document 139-Exhibit 58 Plaintiffs' Amended Complaint adding Defendants Bill Peoples, Ken Hauser, Alcion Paul, Ethel Sizemore, Earl Grant, and Steve McDaniel
- 59. Document 152-Exhibit 59 Notice of Depo and RFP to Woodside Condominium Association, Inc.
- 60. Document 156-Exhibit 60 NOS-Plaintiffs' Objection to Defendant's RFP at Depo
- 61. Document 158-Exhibit 61 Plaintiffs' Fifth Amended Complaint
- 62. Document 160A-Exhibit 62 Answer to Amended Complaint by Bill Peoples
- 63. Document 160B-Exhibit 63 Answer to Amended Complaint by Ken Hauser

- 64. Document 160C-Exhibit 64 Answer to Amended Complaint by Alcion Paul
- 65. Document 160D-Exhibit 65 Answer to Amended Complaint by Ethel Sizemore
- 66. Document 160E-Exhibit 66 Answer to Amended Complaint by Earl Grant
- 67. Document 160F-Exhibit 67 Answer to Amended Complaint by Steve McDaniel
- 68. Document 162A-Exhibit 68 Answer to Amended Complaint by Bill Peoples
- 69. Document 162B-Exhibit 69 Answer to Amended Complaint by Ken Hauser
- 70. Document 162C-Exhibit 70 Answer to Amended Complaint by Alcion Paul
- 71. Document 162D-Exhibit 71 Answer to Amended Complaint by Ethel Sizemore
- 72. Document 162E-Exhibit 72 Answer to Amended Complaint by Earl Grant
- 73. Document 162F-Exhibit 73 Answer to Amended Complaint by Steve McDaniel
- 74. Document 164-Exhibit 74 Defendants' Consolidated First Interrogatories and RFPs to Plaintiffs Katherine L. Johnson, Myrtice Wigfall, Lawanda Morris, Linda Washington, Loretta Rice and John Harmon
- 75. Document 166-Exhibit 75 Notice of Appearance of David L. Horsley
- 76. Document 168-Exhibit 76 Notice of Appearance of H. Arthur Edge, III
- 77. Document 170-Exhibit 77 Plaintiff's NOI to Serve Subpoenas to Non Parties Metcalf Realty Co., Inc. and J. Huggins Realty, Inc.
- 78. Document 171-Exhibit 78 NOI Civil Subpoena for the Production of Documents to Metcalf Realty Co., Inc
- 79. Document 172-Exhibit 79 NOI Civil Subpoena for the Production of Documents to J. Huggins Realty, Inc.
- 80. Document 175-Exhibit 80 Joint Motion to Continue
- 81. Document 177-Exhibit 81 Order-Joint Motion to Continue Granted and Scheduling Conference for 5/11/2018
- 82. Document 179-Exhibit 82 Notice of Appearance of Joe Peddy
- 83. Document 182-Exhibit 83 Cover page for Civil Subpoena for the Production of Documents to Metcalf Realty Co., Inc

- 84. Document 182A-Exhibit 84 Civil Subpoena for the Production of Documents to Metcalf Realty Co., Inc
- 85. Document 185-Exhibit 85 Cover page for Civil Subpoena for the Production of Documents to J. Huggins Realty, Inc.
- 86. Document 185A-Exhibit 86 Civil Subpoena for the Production of Documents to J. Huggins Realty, Inc.
- 87. Document 187-Exhibit 87 Notice of Appearance of James L. Spinks
- 88. Document 193-Exhibit 88 Plaintiffs' Sixth Amended Complaint Adding Plaintiffs John Jowell, Brandie Moore, Patricia Moore, Roderick Moore and Eric Hood
- 89. Document 195-Exhibit 89 Plaintiffs' NOI to Serve Subpoenas to Non Parties Regions Bank
- 90. Document 196-Exhibit 90 NOI Civil Subpoena for the Production of Documents to Regions Bank
- 91. Document 201-Exhibit 91 Order to Continue Discovery and Setting Status Conference for 5/10/2019
- 92. Document 203A-Exhibit 92 Answer to Sixth Amended Complaint by Bill Peoples
- 93. Document 203B-Exhibit 93 Answer to Sixth Amended Complaint by Ken Hauser
- 94. Document 203C-Exhibit 94 Answer to Sixth Amended Complaint by Alcion Paul
- 95. Document 203D-Exhibit 95 Answer to Sixth Amended Complaint by Ethel Sizemore
- 96. Document 203E-Exhibit 96 Answer to Sixth Amended Complaint by Earl Grant
- 97. Document 203F-Exhibit 97 Answer to Sixth Amended Complaint by Steve McDaniel
- 98. Document 205-Exhibit 98 Notice of Appearance of Robert D. Windsor
- 99. Document 207-Exhibit 99 Defendants' Notice of Intent to Serve Subpoena on Non-Party Regions Bank
- 100. Document 208-Exhibit 100 Defendants' NOI Subpoena to Regions Bank
- 101. Document 211-Exhibit 101 Defendants' Motion to Consolidate
- 102. Document 212-Exhibit 102 Defendants' Motion to Consolidate Exhibit A
- 103. Document 213-Exhibit 103 Defendants' Motion to Consolidate Exhibit B

104. Document 215-Exhibit 104 Defendants' Notice of Intent to Serve Subpoena on Non-Party Travelers Insurance
105. Document 216-Exhibit 105 Defendants' NOI Subpoena to Travelers Insurance
106. Document 221-Exhibit 106 Cover page for Civil Subpoena for the Production of Documents to Regions Bank
107. Document 221A-Exhibit 107 Civil Subpoena for the Production of Documents to Regions Bank
108. Document 223-Exhibit 108 Plaintiffs' Response to Defendants' Motion to Consolidate
109. Document 225-Exhibit 109 Order-Defendants' Motion to Consolidate hearing for 8/23/2018
110. Document 230-Exhibit 110 Order-Defendants' Motion to Consolidate is Denied
111. Document 232-Exhibit 111 Plaintiffs' Seventh Amended Complaint adding Plaintiffs Isaiah Craig, Diane Burch and Steven Bell
112. Document 235-Exhibit 112 Suggestion of Death of Linda Joyce Washington and Motion for Substitution of Successor Party in Interest, Terry Collins
113. Document 236-Exhibit 113 Plaintiffs' Eighth Amended Complaint adding Plaintiffs Terry Collins, as Administrator of the Estate of Linda Washington and Terry Collins, Individually and Thelma Parnell
114. Document 239-Exhibit 114 Order for Motion for Substitution is Granted
115. Document 242-Exhibit 115 Cover page for Civil Subpoena for the Production of Documents to Travelers Insurance
116. Document 242A-Exhibit 116 Civil Subpoena for the Production of Documents to Travelers Insurance
117. Document 244A-Exhibit 117 Answer to Seventh Amended Complaint by Bill Peoples
118. Document 244B-Exhibit 118 Answer to Seventh Amended Complaint by Ken Hauser
119. Document 244C-Exhibit 119 Answer to Seventh Amended Complaint by Alcion Paul
120. Document 244D-Exhibit 120 Answer to Seventh Amended Complaint by Ethel Sizemore
121. Document 244E-Exhibit 121 Answer to Seventh Amended Complaint by Earl Grant

122. Document 244F-Exhibit 122 Answer to Seventh Amended Complaint by Steve McDaniel
123. Document 246A-Exhibit 123 Answer to Seventh Amended Complaint by Bill Peoples
124. Document 246B-Exhibit 124 Answer to Seventh Amended Complaint by Ken Hauser
125. Document 246C-Exhibit 125 Answer to Seventh Amended Complaint by Alcion Paul
126. Document 246D-Exhibit 126 Answer to Seventh Amended Complaint by Ethel Sizemore
127. Document 246E-Exhibit 127 Answer to Seventh Amended Complaint by Earl Grant
128. Document 246F-Exhibit 128 Answer to Seventh Amended Complaint by Steve McDaniel
129. Document 248-Exhibit 129 NOS-Defendants' First Discovery Requests to Plaintiffs Thelma Parnell, Terry Collins, individually, Steven Bell, Roderick Moore, Patricia Moore, Loretta Rice, Linda Washington as substituted by Terry Collins, as Administrator of the Estate of Linda Washington, John Jowell, John Harmon, Isaiah Craig, Eric Hood, Diane Burch and Brandie Moore
130. Document 249-Exhibit 130 Woodside Condominium Association's First Discovery Requests to Plaintiff, Thelma Parnell
131. Document 250-Exhibit 131 Woodside Condominium Association's First Discovery Requests to Plaintiff, Terry Collins, individually
132. Document 251-Exhibit 132 Woodside Condominium Association's First Discovery Requests to Plaintiff, Steven Bell
133. Document 252-Exhibit 133 Woodside Condominium Association's First Discovery Requests to Plaintiff, Roderick Moore
134. Document 253-Exhibit 134 Woodside Condominium Association's First Discovery Requests to Plaintiff, Patricia Moore
135. Document 254-Exhibit 135 Woodside Condominium Association's First Discovery Requests to Plaintiff, Linda Washington as substituted by Terry Collins, as Administrator of the Estate of Linda Washington

- 136. Document 255-Exhibit 136 Woodside Condominium Association's First Discovery Requests to Plaintiff, John Jowell
- 137. Document 256-Exhibit 137 Woodside Condominium Association's First Discovery Requests to Plaintiff, John Harmon
- 138. Document 257-Exhibit 138 Woodside Condominium Association's First Discovery Requests to Plaintiff, Isaiah Craig
- 139. Document 258-Exhibit 139 Woodside Condominium Association's First Discovery Requests to Plaintiff, Eric Hood
- 140. Document 259-Exhibit 140 Woodside Condominium Association's First Discovery Requests to Plaintiff, Diane Burch
- 141. Document 260-Exhibit 141 Woodside Condominium Association's First Discovery Requests to Plaintiff, Brandie Moore
- 142. Document 263-Exhibit 142 Woodside Condominium Association's Second Discovery Requests to Plaintiff, Myrtice Wigfall
- 143. Document 264-Exhibit 143 Woodside Condominium Association's Second Discovery Requests to Plaintiff, Lawanda Morris
- 144. Document 265-Exhibit 144 Woodside Condominium Association's Second Discovery Requests to Plaintiff, Katherine Johnson
- 145. Document 268-Exhibit 145 Woodside Condominium Association's Motion to Compel Discovery Responses
- 146. Document 270-Exhibit 146 Order for Woodside Condominium Association's Motion to Compel-hearing set for 12/06/2018
- 147. Document 273-Exhibit 147 Order for Woodside Condominium Association's Motion to Compel Granted
- 148. Document 275-Exhibit 148 Amended Scheduling Order and Trial Setting for 5/04/2020
- 149. Document 277-Exhibit 149 Mediation Order for Deadline of 12/02/2019
- 150. Document 282-Exhibit 150 Joint Motion for Protective Order
- 151. Document 283-Exhibit 151 Proposed Protective Order
- 152. Document 285-Exhibit 152 Protective Order
- 153. Document 287-Exhibit 153 Request for Record Search/Copies of Court Records for Real Estate Asst., LLC
- 154. Document 288-Exhibit 154 NOS-Defendant's Supplemental Document Production bates labeled Woodside001576 – Woodside0016484

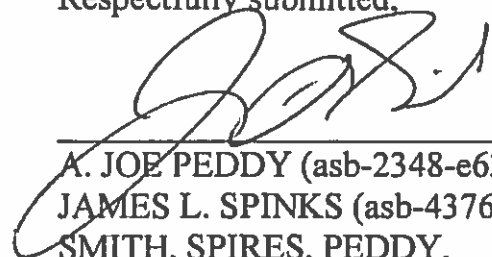
- 155. Document 290-Exhibit 155 NOS-Defendant's Supplemental Document Production bates labeled Woodside001576 – Woodside017411
- 156. Document 292-Exhibit 156 Plaintiff's Ninth Amended Complaint adding Plaintiff Mitchell Green, Individually
- 157. Document 294-Exhibit 157 NOS-Notice of Intent to Serve Subpoena on Non Parties Metropolitan Property and Casualty Insurance Company and Branch Banking and Trust Company
- 158. Document 295-Exhibit 158 Notice of Intent to Serve Subpoena on Non Parties Metropolitan Property and Casualty Insurance Company and Branch Banking and Trust Company
- 159. Document 296-Exhibit 159 Subpoenas for Metropolitan Property and Casualty Insurance Company and Branch Banking and Trust Company
- 160. Document 298A-Exhibit 160 Answer to Ninth Amended Complaint by Bill Peoples
- 161. Document 298B-Exhibit 161 Answer to Ninth Amended Complaint by Ken Hauser
- 162. Document 298C-Exhibit 162 Answer to Ninth Amended Complaint by Alcion Paul
- 163. Document 298D-Exhibit 163 Answer to Ninth Amended Complaint by Ethel Sizemore
- 164. Document 298E-Exhibit 164 Answer to Ninth Amended Complaint by Earl Grant
- 165. Document 298F-Exhibit 165 Answer to Ninth Amended Complaint by Steve McDaniel
- 166. Document 300-Exhibit 166 Notice of Depos of Plaintiffs Brandie Moore, Eric Hood, Patricia Moore and Roderick Moore
- 167. Document 301-Exhibit 167 Notice of Depo of Plaintiff Brandie Moore
- 168. Document 302-Exhibit 168 Notice of Depo of Plaintiff Eric Hood
- 169. Document 303-Exhibit 169 Notice of Depo of Plaintiff Patricia Moore
- 170. Document 304-Exhibit 170 Notice of Depo of Plaintiff Roderick Moore
- 171. Document 306-Exhibit 171 Notice of Depos of Plaintiffs Isaiah Craig, John Jowell, Mitchell Green, Steven Bell, Diane Burch, Thelma Parnell and Terry Collins

- 172. Document 307-Exhibit 172 Notice of Depo of Plaintiff Isaiah Craig
- 173. Document 308-Exhibit 173 Notice of Depo of Plaintiff John Jowell
- 174. Document 309-Exhibit 174 Notice of Depo of Plaintiff Michell Green
- 175. Document 310-Exhibit 175 Notice of Depo of Plaintiff Steven Bell
- 176. Document 311-Exhibit 176 Notice of Depo of Plaintiff Diane Burch
- 177. Document 312-Exhibit 177 Notice of Depo of Plaintiff Thelma Parnell
- 178. Document 313-Exhibit 178 Notice of Depo of Plaintiff Terry Collins
- 179. Document 315-Exhibit 179 NOS-Amended Notice of Depos of Plaintiffs Mitchell Green and Diane Burch
- 180. Document 316-Exhibit 180 Amended Notice of Depo of Plaintiff Michell Green
- 181. Document 317-Exhibit 181 Amended Notice of Depo of Plaintiff Diane Burch
- 182. Document 319-Exhibit 182 NOS-Defendant's Amended Notice of Deposition of Isiah Craig
- 183. Document 320-Exhibit 183 Amended Notice of Depo of Plaintiff Isaiah Craig
- 184. Document 322-Exhibit 184 NOS-Defendants' First Discovery Requests to Plaintiff, Mitchell Green
- 185. Document 323-Exhibit 185 Woodside Condominium Association's First Discovery Requests to Plaintiff, Mitchell Green
- 186. Document 325-Exhibit 186 NOS-Defendant's Amended Notice of Depositions of Steven Bell and Thelma Parnell
- 187. Document 326-Exhibit 187 Amended Notice of Depo of Plaintiff Steven Bell
- 188. Document 327-Exhibit 188 Amended Notice of Depo of Plaintiff Thelma Parnell
- 189. Document 329-Exhibit 189 NOS-Defendant's Supplemental Document Production Woodside 17412-18476
- 190. Document 331-Exhibit 190 Plaintiffs' Tenth Amended Complaint Adding as Plaintiff

- 191. Document 333-Exhibit 191 Plaintiff's Eleventh Amended Complaint
- 192. Document 336-Exhibit 192 Defendant's Motion to Dismiss for Failure to Prosecute
- 193. Document 337-Exhibit 193 Defendant's Motion to Dismiss for Failure to Prosecute-Exhibit A
- 194. Document 339-Exhibit 194 Defendants' Rule 26 Expert Disclosures
- 195. Document 341-Exhibit 195 Plaintiffs' Twelfth Amended Complaint Adding as Plaintiff Consider It Sold, LLC
- 196. Document 343-Exhibit 196 Plaintiffs' Twelfth Amended Complaint Adding as Plaintiff Consider It Sold, LLC
- 197. Document 345-Exhibit 197 Order-Motion to Dismiss for Failure to Prosecute Plaintiffs to respond by 12/11/2019
- 198. Document 348-Exhibit 198 Plaintiffs' Thirteenth Amended Complaint Adding a Claim by Eric Hood for Violations of the Fair Housing Act, 42 U.S.C. §§ 3601-19
- 199. Document 350-Exhibit 199 Plaintiffs' Opposition to Defendants' Motion to Dismiss for Want of Prosecution
- 200. Document 351-Exhibit 200 Affidavit of H. Arthur Edge, III
- 201. Document 353-Exhibit 201 Order for Defendants' Motion to Dismiss for Failure to Prosecute is Denied

Dated: January 2nd, 2020

Respectfully submitted,



A. JOE PEDDY (asb-2348-e63a)
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record on this the 2nd day of January, 2020.

Gregory A. Kennemer (greg@kennemer.legal)

Jeffrey H. Dial (jdial88609@aol.com)

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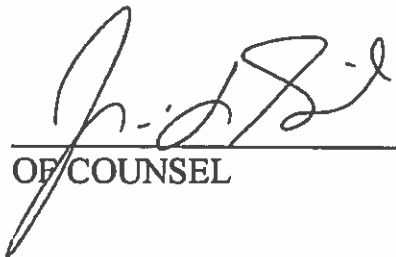
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